


IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

FILED BY  D.C.

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THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W.D. OF TENNESSEE

**MICHAEL JENKINS,**

**Plaintiff,**

**v.**

**CASE NO. 05-2512 Ma P**

**MEDICAL STAFFING NETWORK,  
INC., a Florida Corporation and  
MEDICAL STAFFING NETWORK  
HOLDINGS, INC., a Florida Corporation,**

**Defendants.**

**~~JOINT PROPOSED~~ SCHEDULING ORDER**

Pursuant to the Notice of Setting dated September 3, 2005, counsel for the parties submit the following Joint Proposed Scheduling Order:

**I. Proposed Deadlines**

The parties submit the following proposed deadlines for discovery and motions in this case:

1. Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1): November 3, 2005.
2. Joining Parties: December 23, 2005;
3. Filing Motions to Amend Pleadings: December 23, 2005;
4. Completing All Discovery: June 23, 2006;
  - (a) Document Production: June 23, 2006
  - (b) Interrogatories: June 23, 2006

- (c) Requests for Admissions: June 23, 2006
  - (d) Depositions: June 23, 2006
  - (e) Expert Witness Disclosure (Rule 26):
    - (1) Disclosure of Plaintiff's Rule 26 Expert Information: April 21, 2006
    - (2) Disclosure of Defendants' Rule 26 Expert Information: May 22, 2006
    - (3) Supplementation of Expert Disclosures: June 1, 2006
    - (4) Expert Witness Depositions: June 23, 2006
5. Filing Dispositive Motions: July 28, 2006

## **II. OTHER RELEVANT MATTERS:**

No depositions may be scheduled to occur after the discovery cutoff date. All discovery related motions and discovery requests that require a response must be filed sufficiently in advance of the discovery cutoff date to enable opposing counsel to respond prior to the discovery deadline.

Motions to compel discovery are to be filed and served by the date of the discovery deadline or 30 days of the default or the service of the response, answer or objection which is the subject of the motion, if the default occurs within 30 days of the discovery deadline, unless the time for filing such motion is extended for good cause shown. Failure to timely file a motion to compel constitutes a waiver.

This case is set for jury trial, and the trial is expected to last approximately three (3) to four (4) days. The pretrial order deadline, pretrial conference date, and trial date will be set by the presiding judge.


The parties are directed to report to the Court after the close of discovery on whether court-supervised attorney mediation or private mediation is appropriate.

The opposing party may file a response to any motion filed in this matter. Neither party may file an additional reply, however, without leave of the Court. If a party believes that a reply is necessary, it shall file a motion for leave to file a reply accompanied by a memorandum setting forth the reasons for which a reply is required.

The parties have not consented to trial before the magistrate judge.

This order has been entered after consultation with trial counsel pursuant to notice. Absent good cause shown, the deadlines set by this order will not be modified or extended.

IT IS SO ORDERED.



TU M. PHAM  
United States Magistrate Judge

Date: October 19, 2005

APPROVED:

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## Notice of Distribution

This notice confirms a copy of the document docketed as number 11 in case 2:05-CV-02512 was distributed by fax, mail, or direct printing on October 24, 2005 to the parties listed.

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Honorable Samuel Mays  
US DISTRICT COURT